

Finding of No Significant Impact
Eradication of Isolated Populations of Light Brown Apple Moth in California
Revised Environmental Assessment
June, 2007

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), has prepared a revised environmental assessment (EA) that analyzes potential environmental consequences of eradicating isolated populations of light brown apple moth (*Epiphyas postvittana*) (LBAM) in California. The EA, incorporated by reference in this document, is available online at http://www.aphis.usda.gov/plant_health/ea/downloads/lbam-ea-07-18-07.pdf and from:

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Plant Protection and Quarantine
Emergency and Domestic Programs
Emergency Management
4700 River Road, Unit 134
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The revised EA analyzed alternatives consisting of (1) maintaining the Federal quarantine order without further action by APHIS (no action alternative), and (2) continuation of the Federal quarantine order along with eradication of isolated populations of LBAM in California with the use of *Bacillus thuringiensis kurstaki* (Btk) and/or LBAM-specific pheromone (treatment alternative). The revised EA evaluated the potential impacts from eradication treatments of small, isolated populations and determined that any potential impacts would be limited. Since the circumstances surrounding each isolated population are unique, each site will be considered in a finding of no significant impact (FONSI) prior to treatment. This FONSI addresses the treatment for LBAM in Novato, Marin County, California (see attachment 1).

Treatment in the Novato Eradication Area

Novato, California is the northernmost city in Marin County, approximately twenty-nine miles north of San Francisco and thirty-seven miles northwest of Oakland. Novato covers twenty-eight square miles. As of the 2000 Census, Novato had a population of 47,630. The State of California estimates Novato's population at 52,737 as of January 1, 2008. Novato has a rural atmosphere largely because of its low population density and the high amount of open space and parks in and near the city. Novato's population density is about one-half that of San Rafael, and is nearly one-third that of Petaluma and Vallejo.

Two LBAMs were trapped in Novato in 2008. An eradication zone has been defined with a 1.5 mile area around the two finds. This FONSI addresses not only treatment for LBAM for these two finds but also any additional finds within the eradication boundary. Maps for future treatment sites within this potential treatment area will be posted online at http://www.aphis.usda.gov/plant_health/ea/lbam.shtml

When an LBAM is found within this eradication boundary, a 200-meter radius area will be defined as a treatment area for each find. The treatment areas will be treated with Isomate-LBAM plus (pheromone-impregnated twist ties) at a rate of 250 dispensers per acre by attaching the twist ties to

trees, shrubs, and other fixtures. The twist ties allow for the continual release of pheromone over the course of 120 days. The twist ties will be removed after two LBAM life cycles (a lifecycle could be up to six months in certain areas). In some cases the twist ties may be replaced for additional treatments. When all treatments are completed, the twist ties will be removed.

The revised EA evaluated the potential impacts of eradication treatments of small isolated populations like the ones in Novato. Due to the nature of the dispenser and the pheromone itself, there will be no impacts to human health and limited, if any, impacts to nontarget species because the product is contained in dispensers that are tied to fixtures and will be removed after treatment. The pheromone itself has been shown to attract several native tortricids as well as a pyralid based on trap catches that are baited with LBAM pheromone. However, each of these species has a widespread distribution and therefore any impact to these non-targets will be minimal and localized. In addition, there will be no negative cumulative effects from this action in combination with any other actions because the treatments in isolated population areas will not be combined with other LBAM eradication tools. These isolated populations are at least five miles away from any generally infested area or they are separated from the generally infested area by natural barriers to LBAM movement.

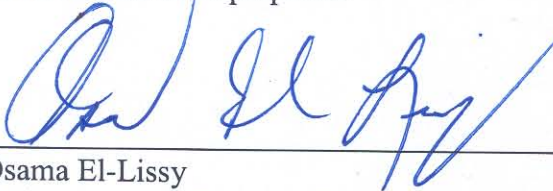
APHIS conducted an online query of the Sacramento Fish and Wildlife Office's species lists for the eradication zones including the Novato (484A) and Petaluma River (484D) U.S.G.S. 7 ½ minute quadrangles on June 27, 2008 available at http://www.fws.gov/sacramento/es/spp_lists/auto_list_form.cfm. APHIS has reviewed the eradication boundary and the potential for co-occurrence of listed species and their critical habitat. APHIS has determined the preferred alternative will have no effect on listed species or their critical habitat due to the lack of appropriate habitat within the treatment area.

This FONSI was made available for a 30 day public comment period. Only one comment was received. The commenter was concerned with the use of twist ties in urban areas, the inert ingredients, the potential use of Btk. Although twist ties were originally marketed toward use in an agricultural setting to aid in control of LBAM, twist ties can be used in any area to aid in eradicating small populations of LBAM. The only chemical that will be emitted from the twist ties is the LBAM pheromone itself. All other inert ingredients will be contained in the twist tie which will be removed from the treatment area at the end of its useful life. APHIS and CDFA do not intend to use Btk in this eradication area. If in the future, APHIS and CDFA would like to use Btk in this area another FONSI will be provided for a 30-day public comment period before treatment. Use of LBAM twist ties in small isolated populations, similar to the population that exists in Novato, have been successful in eradicating LBAM in that area without the use of other treatment alternatives.

In addition, the commenter questioned the entire LBAM program stating that LBAM has been in California for at least 10 years and referencing statements by Dr. James Carey, Dr. Daniel Harder, and Jeff Rosendale. Based on the scientific evidence and trapping data available to APHIS and CDFA, the LBAM population has been recently introduced. No scientific evidence or data has been presented in support of the statements that LBAM has been here for at least 10 years. CDFA and APHIS have requested the data to support these statements and have not received any at this time. The reports produced by Dr. James Carey, Dr. Daniel Harder, and Jeff Rosendale have been reviewed by our panel of experts known as The Working Group and their responses to these reports can be found on the CDFA website available at http://www.cdfa.ca.gov/phpps/pdep/lbam/lbam_main.html.

There are no disproportionate adverse effects to minorities, low-income populations, or children in accordance with Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations," and Executive Order 13045, "Protection of Children from Environmental Health Risks and Safety Risks."

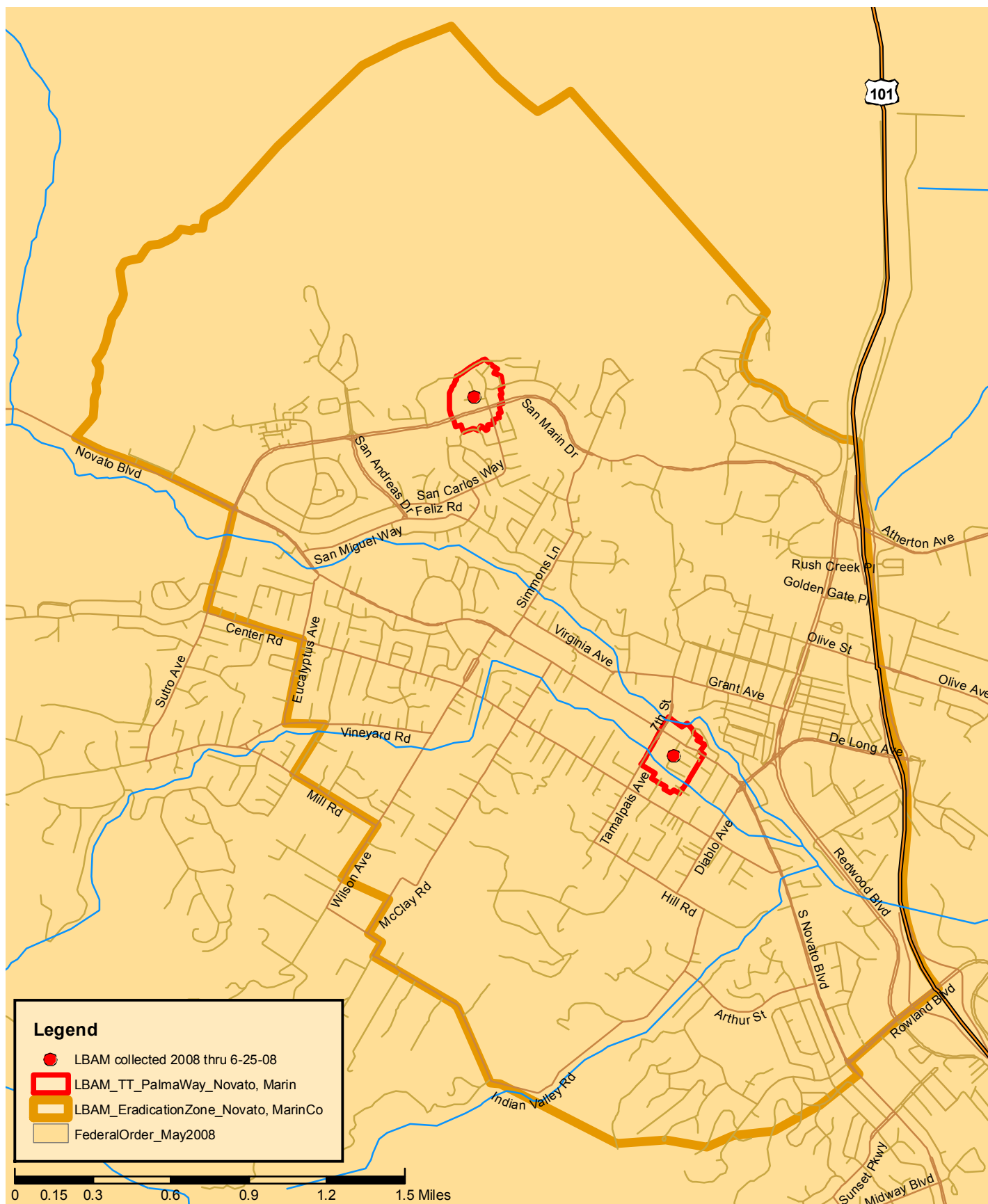
APHIS' finding of no significant impact for the treatments within the eradication boundary is based upon the expected limited environmental consequences, as analyzed in the EA. An environmental impact statement (EIS) must be prepared if implementation of the proposed action may significantly affect the quality of the human environment. I have determined that there would be no significant impact to the human environment from the implementation of the treatment alternative and, therefore, no EIS needs to be prepared.



Osama El-Lissy
Emergency and Domestic Programs
Plant Protection and Quarantine
Animal and Plant Health Inspection Agency

8/26/2008
Date

Eradication Zone for Light Brown Apple Moth Novato, Marin County, CA



Eradication Area for Light Brown Apple Moth Palma Way, Novato, Marin County, CA



Eradication Area for Light Brown Apple Moth Boulevard Terrace, Novato, Marin County, CA

